

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**MARK MONDRAGON o/b/o
D.M. a minor child,**

Plaintiffs,

vs.

Case No. 1:21-CV-00427 MV/KRS

**RIO RANCHO PUBLIC SCHOOLS,
BOARD OF EDUCATION and
GEORGE ARCHULETA in his
Individual and official capacity,**

Defendants.

JOINT MOTION FOR AMENDED SCHEDULING ORDER

COME NOW the parties, by and through undersigned counsel, hereby submit this Joint Motion for an Amended Scheduling Order and as grounds therefore state:

1. Plaintiff filed a Motion to Modify Scheduling Order and Vacate Mediation, (Doc. 23) filed September 1, 2021.
2. Defendants filed a joint response on September 15, 2021 (Doc. 24).
3. The Court entered an Order Granting Motion to Extend Deadlines and Vacate Settlement Conference on October 6, 2021 (Doc. 28).
4. Pursuant to the Court's Order (Doc. 28), the parties were to meet and confer to develop and file a Proposed Amended Scheduling Order by October 19, 2021.
5. This is the first lawsuit in a trilogy of lawsuits which have the same defendants and similar claims. The other two lawsuits are:
 - a. Montoya v. Rio Rancho Public Schools Board of Education and George Archuleta, Case No. 1:21-cv-00648-KWR-JRF;

b. Salazar v. Rio Rancho Public Schools Board of Education, George Archuleta and John Doe, Case No. 1:21-cv-00751-KK-JHR.

6. The parties are cooperating in utilizing the discovery in all three cases to eliminate the need for duplicative requests and redundant depositions.

7. In the related case, Salazar v. Rio Rancho Public Schools Board of Education, et al., Case No. 1:21-cv-00751-KK-JHR, a scheduling order was entered on October 15, 2021 (Doc. 15).

8. The parties have conferred regarding the most judicious manner in which to proceed with discovery, depositions and motion practice, and respectfully request the Court adopt the Amended Scheduling Order as it harmonizes to the extent possible discovery and case management in two of the three lawsuits.

WHEREFORE, the parties jointly move for entry of the Amended Scheduling Order.

Respectfully submitted:

WALZ AND ASSOCIATES, P.C.

/s/ Jerry A. Walz
JERRY A. WALZ, ESQ.
Attorney for RRPS Defendants
133 Eubank Blvd. NE
Albuquerque, NM 87123
Phone: (505) 275-1800
jerryawalz@walzandassociates.com

QUIÑONES LAW FIRM LLC

/s/ Carlos M. Quiñones, Esq.
CARLOS M. QUIÑONES, ESQ.
Attorney for Defendant Archuleta
1223 S. Saint Francis Dr., Ste. C
Santa Fe, NM 87505
(505) 992-1515
quinoneslaw@cybermesa.com

BOWLES LAW FIRM

/s/ Jason Bowles, Esq.
JASON BOWLES, ESQ.
4811 Hardware Drive, Bldg. D, Suite 5
Albuquerque, NM 87109
(505) 217-2680
bowles@bowles-lawfirm.com

---and---

GORENCE LAW FIRM, LLC
ROBERT GORENCE, ESQ.
300 Central Avenue SW, Suite 1000E
Albuquerque, NM 87102
505-244-0214
gorence@golaw.us

---and---

TODD J. BULLION, ESQ.
300 Central Ave SW, Suite 1000E
Albuquerque, NM 87102
(505) 452-7674
todd@bullionlaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of October, 2021, I filed the foregoing electronically through the CM/ECF system which caused all parties of record to be served by electronic mail, as more fully reflected in the Notice of Electronic Filing.

/s/ Jerry A. Walz

Jerry A. Walz, Esq.